

ATTACHMENT J-2

RESPONSE LETTERS ON NOTICE OF PREPARATION (NOP), RESPONSE LETTERS ON SUPPLEMENTAL NOP, RESPONSE LETTERS ON NOTICE OF INTENT (NOI)

RESPONSES TO THE 2004 NOTICE OF PREPARATION

This attachment contains the following responses to the 2004 Notice of Preparation:

Responses from County Agencies

- County of Orange (December 15, 2004, 1 page)
- County of Riverside (December 20, 2004, 2 pages)
- Riverside County Flood Control and Water Conservation District (November 29, 2004, 2 pages)
- Riverside County Habitat Conservation Agency (December 20, 2004, 3 pages)
- Riverside County Waste Management Department (December 17, 2004, 4 pages)

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County of Orange
Planning & Development Services Department

BRYAN G. SPEEGLE
DIRECTOR

300 N. FLOWER ST.
SANTA ANA, CALIFORNIA

MAILING ADDRESS:
P.O. BOX 4048
SANTA ANA, CA 92702-4048

NCL 04-056

December 15, 2004

Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street,
P.O. Box 12008
Riverside, CA 92502-2208

SUBJECT: NOP for the Mid-County Parkway Corridor Project

Dear Ms. Bechtel:

Thank you for the opportunity to respond to the above referenced project. The County of Orange has reviewed the Notice of Preparation (NOP) and has no comment at this time. However, we would appreciate being informed of any further developments.

If you have any questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Tippetts", is written over a horizontal line.

Ronald L. Tippetts, Chief
Public Projects

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TRANSPORTATION COMMISSION

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County of Riverside

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RIVERSIDE OFFICE:
4080 Lemon Street, 5th Floor
P.O. Box 1527
Riverside, CA 92502-1527
(951) 955-1010
Fax (951) 955-1019

David P. Stahovich
Maria Broos
Robert Caliva
Sandra Isom



SUPERVISOR BOB BUSTER
FIRST DISTRICT

LAKE ELSINORE OFFICE:
333 West Limited Avenue
Lake Elsinore, CA 92530
(951) 245-3330
(951) 245-3315

Wendy Kolk

December 20, 2004

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

Ms. Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
P.O. Box 12008
Riverside, CA 92502-2208

Subject: Notice of Preparation for the Draft Environmental Impact
Statement/Environmental Impact Report (EIS/EIR) for the Mid County
Parkway Corridor Project

Cathy,
Dear Ms. Bechtel:

I am pleased to provide comments on this project that is of great importance to my constituents and all of Riverside County. The segment of the Mid-County Parkway extending between I-15 and I-215 includes the communities of Mead Valley, Woodcrest, Lake Mathews, and Temescal Valley, which are all within the 1st Supervisorial District.

There is widespread recognition in these communities of the need to improve Cajalco Expressway in order to provide a facility that can adequately and safely move traffic. I believe that RCTC's efforts need to focus on a phased solution that is buildable in the short-term, while preserving right-of-way for the long-term circulation needs. In order to achieve that, I urge you to focus on clearing a project as part of the environmental document that is buildable given funding constraints, that minimizes community opposition, and that is sensitive to and achieves a balance with environmental constraints.

It is my understanding that the preliminary traffic projections being developed for this project may support an expressway-type facility, rather than a freeway corridor. I therefore request that the following issues be identified and analyzed as part of this study effort:

1. Cajalco Expressway should be studied as a four-lane facility (two westbound lanes and two eastbound lanes) between the I-15 and the I-215.
2. The primary alignment should follow, roughly, the current alignment within this area.
3. The project should avoid encroaching on the north side of Lake Mathews.

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4. Major horizontal and vertical alignment modifications along Cajalco should be considered only westerly of La Sierra Avenue as this will improve public safety.
5. The four-lane configuration of Cajalco should study the need for intersection improvements such as signalization, turning pockets and acceleration/deceleration lanes to improve public safety and protect local circulation.
6. The inclusion of multi-purpose trails should be studied.
7. Improvements to the I-15 freeway, such as adding additional travel lanes, must be considered with this project.
8. Improvements to the I-215 freeway, such as adding additional travel lanes, must be considered with this project.
9. Interchange improvements to the I-15/SR 91 interchange must be considered with this project.

I look forward to working closely with the Commission on identifying a phased approach that constructs the safety and mobility improvements that are urgently needed, while still planning for our future needs.

Sincerely,



Bob Buster
Supervisor, 1st District

WARREN D. WILLIAMS
General Manager-Chief Engineer



1995 MARKET STREET
RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX

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RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

November 29, 2004

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

Ms. Cathy Bechtel
Riverside County
Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92502-2208

Dear Ms. Bechtel:

Re: Notice of Preparation of a Draft
Environmental Impact Report for the
Mid County Parkway Corridor Project

This letter is written in response to the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Mid County Parkway Corridor Project. The proposed project consists of the construction of a roadway from Interstate 15 on the west to State Route 79 on the east. The roadway will extend through the cities of Corona, Perris, and San Jacinto within western Riverside County, California.

The Riverside County Flood Control and Water Conservation District (District) has the following comments/concerns that should be addressed in DEIR:

1. An applicable National Pollutant Discharge Elimination System (NPDES) Construction Activity General Permit from either the State Water Resources Control Board (SWRCB) or the California Regional Water Quality Control Board (RWQCB) – Santa Ana Region will be required for construction of the proposed project. In general, projects disturbing 1 or more acres (or less than 1 acre if part of a larger common plan of development) are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ) issued by the SWRCB. However, portions of the proposed project are located within the San Jacinto Watershed and may be required to obtain coverage under the Watershed-Wide Waste Discharge Requirements for Storm Water Discharges in the San Jacinto Watershed (Order No. 01-34) issued by the RWQCB. More information regarding these permits may be obtained on the SWRCB website at www.swrcb.ca.gov.
2. Existing District facilities are located within the proposed project area and may be impacted. Any work that involves District right of way, easements or facilities will require an encroachment permit from the District. The construction of facilities within road right of way that may impact District storm drains should also be coordinated with us. To obtain further information on encroachment permits or existing facilities, contact Ed Lotz of the District's Encroachment Permit Section at 951.955.1266.

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Ms. Cathy Bechtel

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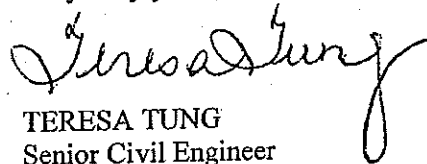
November 29, 2004

Re: Notice of Preparation of a Draft
Environmental Impact Report for the
Mid County Parkway Corridor Project

3. The proposed project is located within the District's Lake Mathews, Mead Valley, Perris Valley, San Jacinto River and Lakeview Nuevo Master Drainage Plans (MDPs). When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the plan of the most serious flooding problems and will provide adequate drainage outlets. An exhibit outlining the MDP proposed facilities, and possible impacts on these facilities, should be included in the DEIR. The District's MDP facility maps can be viewed online at www.floodcontrol.co.riverside.ca.us/mdp.asp. To obtain further information on the MDPs and the proposed District facilities, contact Art Diaz of the District's Planning Section at 951.955.1345.
4. The Santa Ana Region, Regional Water Quality Control Board has issued a Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (R8-2002-0011) to the Cities and unincorporated County area within the Santa Ana Watershed. This permit requires the Permittees to develop a Water Quality Management Plan (WQMP) for new development by January 1, 2005. This plan will require most new development and redevelopment projects to implement site, source and treatment control best management practices (BMPs) to minimize the discharge of pollutants in stormwater and to prevent non-stormwater discharges to the MS4. A draft copy of the WQMP is available at http://www.swrcb.ca.gov/rwqcb8/html/rc_permittee_submittals.html. Please note that projects not submitted to the City or County Planning Department by January 1, 2005 will be subject to the new WQMP requirements.

Thank you for the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to Jason Swenson at 951.955.8082 or me at 951.955.1233.

Very truly yours,


TERESA TUNG
Senior Civil Engineer

c: TLMA
Attn: Greg Neal
Ed Lotz
Art Diaz

JS:mev
PC91668

Riverside County Habitat Conservation Agency

A Joint Powers Authority

December 20, 2004

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 RIVERSIDE COUNTY
 TRANSPORTATION COMMISSION

RCHCA
Board of Directors

City of Corona
 Eugene Montanez

City of Hemet
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County of Riverside
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City of Temecula
 Steve Brown

Executive Director
 Carolyn Syms Luna

General Counsel
 Karin Watts-Bazan
 Deputy County Counsel

Ms. Cathy Bechtel
 Riverside County Transportation Commission
 4080 Lemon Street, 3rd Floor
 P.O. Box 12008
 Riverside, CA 92502-2208

Dear Ms. Bechtel:

Subject: Notice of Preparation for the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Mid County Parkway Corridor Project

Thank you for providing the RCHCA with the opportunity to review and comment on the Notice of Preparation for the Mid County Parkway EIS/EIR. The following items constitute our comments at this time:

1. Construction of the routes depicted in Alternatives 2-6 may result in varying degrees of impact to the Lake Mathews Stephens' Kangaroo Rat (SKR) Reserve. Similarly, expansion of Cajalco Road south of Lake Perris may have the potential to affect the San Jacinto/Lake Perris SKR Reserve. The relative impacts to both reserves will need to be quantified and analyzed in the EIS/EIR. The resulting mitigation measures will need to be consistent with the SKR Habitat Conservation Plan (SKR HCP).
2. The SKR HCP provides for the construction of public facilities in core reserves (see attached excerpt from the SKR HCP). Such facilities can include, but are not limited to transportation improvements. Construction of these facilities will require the sponsoring agency to mitigate on a 1:1 basis for all SKR occupied habitat disturbed as a result of the project. The location of the replacement acreage is subject to approval by the U.S. Fish and Wildlife Service and the California Department of Fish and Game.

The RCHCA looks forward to discussing this matter with you further and commenting on the draft EIS/EIR when it is released for public review. If you have any questions concerning this matter, please contact me at 955-6892.

Sincerely,

Kristi Lovelady
 Kristi Lovelady,
 Administrative Manager

Attachment

xc: Robin Reeser Lowe, RCHCA Chairperson
 Kelley Seyarto, RCHCA Vice Chairperson
 Carolyn Syms-Luna, RCHCA Executive Director
 Tony Carstens, TLMA Director
 Ron Rempel, RCA General Manager
 Karin Watts-Bazan, RCHCA Legal Counsel

4080 Lemon Street, 12th Floor * Riverside, California 92501 * (909) 955-6625
 P. O. Box 1605 * Riverside, California 92502-1605 * FAX (909) 955-6879

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improvement to the property line of the parcel on which the improvement is located is less than the distance required to be cleared, the adjacent owner, lessee, or RCHCA member agency will be permitted to clear an area on his/her property sufficient to establish the required fire break.

Vacant Unimproved Property

For vacant unimproved property, owners or their lessees and RCHCA member agencies will be permitted to clear all flammable vegetation down to bare mineral soil using methods, including discing, to establish a fire break at the property line of up to 100 feet. Property owners or their lessees and RCHCA member agencies will be permitted to exceed this 100-foot width if such a fire break is deemed necessary by the local fire department to protect public safety and welfare.

Property owners or their lessees and the member agencies will not be required to perform SKR surveys or pay SKR mitigation fees as a condition precedent to performance of these fire protection activities. It is understood that the conservation provisions of this HCP will provide mitigation for incidental take of SKR resulting from these fire prevention activities.

In order to minimize potential impacts to SKR, any weed abatement notice or hazard reduction notice issued for property within an area known or believed to be occupied by SKR will recommend use of shallow discing (i.e., depths of five inches or less) when possible.

The above fire prevention activities are more fully described in a separate Cooperative Agreement recently executed among the USFWS, CDFG, and all eight member agencies of the RCHCA.

s. Public Facility Improvements

In order to carry out their responsibility to ensure the health, safety, and welfare of the general public, public agencies in the HCP area must maintain their ability to construct public facilities identified in General Plans, Transportation Improvement Plans, Capital Improvement Plans, and other adopted documents. Accordingly, under the terms of this HCP public agencies will be permitted to construct public facilities including, but not limited to, the following:

1. Construction of public roadways to their ultimate width as identified in adopted General Plans;
2. Construction of improvements identified in adopted local Transportation Improvement Programs;
3. Construction of cooperative projects undertaken between public agencies in the HCP area and other cities, counties, water districts, Caltrans, the U.S. Army Corps of Engineers, and any other federal and State agencies, and;
4. Construction of other public facilities and projects identified in adopted local General Plans or Capital Improvement Programs.

Construction of the above public facilities will be permitted in core reserves provided that the sponsoring agency(ies) mitigate on a 1:1 basis for all SKR occupied habitat disturbed as a result of the project. Specifically, for each acre of SKR occupied habitat disturbed in a core reserve, the sponsoring agency will acquire and permanently

dedicate to SKR conservation a replacement acre of SKR occupied habitat. The location of such replacement acreage will be subject to approval by USFWS and CDFG.

For purposes of this section, public facilities shall include all public improvements, public services, and community amenities.

t. Public Facility Operations and Maintenance Activities

As a final category of public safety and welfare measures, this HCP is intended to allow RCHCA member agencies, MWD and other water agencies, flood control districts, utility companies, and other public entities to conduct those activities necessary to operate and maintain public facilities located throughout the plan area. Such facilities include, but are not limited to: publicly maintained roads and their rights-of-way; flood control facilities; landfills and related operations; public buildings; schools; water storage, treatment, and transmission facilities; sewerage transmission and treatment facilities; reclaimed water storage and transmission facilities; public parks, and; utility pipelines and transmission lines.

This provision includes only public facilities located within the HCP area, and is intended to cover those activities necessary for their operation and maintenance. Such activities include, but are not limited to: grading and paving of public roadway surfaces and road shoulders; regular covering of landfills and appurtenant earth movement; clearance of flood control channels and operation of flood control facilities; regular upkeep of buildings and grounds; monitoring and repair of water storage, treatment, and transmission facilities, sewerage transmission and treatment facilities, reclaimed water storage and transmission facilities, gas and electric distribution lines and operations buildings.

Operation and maintenance of MWD facilities in the Lake Mathews and Lake Skinner core reserves are addressed in detail in the MWD/RCHCA Southwestern Riverside County MSHCP and Lake Mathews MSHCP. Within MWD lands contained in the core reserves, the terms and conditions of those MSHCP's will not be superseded by this HCP.

More detailed information concerning public facility operations and maintenance activities authorized under this HCP is presented in *Appendix F*.

u. Agricultural Operations

In general, dryland farming occurring in the HCP area has been shown not to be incompatible with SKR. The species is known to coexist with ongoing agricultural operations in several portions of the HCP area. Given that situation and the tremendous importance of agriculture to the economy of western Riverside County, this HCP intends to facilitate the continuation of farming in the plan area. Bona fide agricultural operations located in the HCP area will not be required to perform SKR biological surveys. Additionally, take of SKR occurring incidental to agricultural operations will be permitted under this HCP.

For the purposes of this HCP determinations of bona fide agricultural operations will be made by the Riverside County Agricultural Commissioner.

v. HCP Participation by Land Owners Outside of Plan Area

During the process of developing this HCP the RCHCA was requested to develop a procedure under which individuals in Riverside County who own land outside its

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Riverside County
Waste Management Department

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RIVERSIDE COUNTY
TRANSPORTATION COMMISSION

14310 Frederick St. Moreno Valley, CA 92553
Phone: (951) 486-3200

FAX NUMBERS:
(951) 486-3205 (Admin.)
(951) 486-3250 (Eng./Env./Planning)
(951) 486-3230 (Accounting)

FAX COVER SHEET

For Immediate Delivery

To: Cathy Bechtel

From: Sung Kyu Lee

Total Number of Pages, Including Cover Sheet: 4 B.1.9.2.1

**Riverside County
Waste Management Department***Hans W. Kernkamp, General Manager-Chief Engineer*

December 17, 2004

Cathy Bechtel
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
P. O. Box 12008
Riverside, CA 92502-2208

**RE: Notice of Preparation (NOP) of an Environmental Impact
Statement/Environmental Impact Report (EIS/EIR) for the Mid County
Parkway Corridor Project**

Dear Ms. Bechtel:

The Riverside County Waste Management Department (Department) has reviewed the above-mentioned NOP for the proposed project, which is a key east-west regional transportation corridor, generally following the alignments of Ramona Expressway, Cajalco Road, and El Sobrante Road and traversing 4 jurisdictions, namely, County of Riverside, City of Perris, City of San Jacinto, and City of Corona, to a connection with Interstate 15. The project area to be studied in the EIS/EIR is approximately 32 miles long and ranges from 1 to 4 miles in width. No solid waste facilities are found to be located within the study area of the project.

Implementation of the project will span years and involve clearing of farmlands and natural vegetation on vacant lands, demolition of buildings, existing road pavements and structures, and construction of miles of new road pavements and structures, and some bridges. Depending on the scale and pace of construction, project implementation could generate a substantial amount of green waste and construction and demolition (C&D) waste. Disposal of the project's waste may occur in any of the three County landfills in Western Riverside County, namely, Badlands Landfill, Lamb Canyon Landfill, and El Sobrante Landfill.

The potential solid waste impacts of the project are two fold. First, the project may produce a significant amount of green waste and C&D waste that require disposal at County landfills. If a huge amount of the heavy C&D waste is brought to a County landfill for disposal, it could cause the landfill to either exceed its permitted daily capacity, thus resulting in a violation of State regulations, or shut down before closing time, thus resulting in forced rejection of waste from other generators that would have otherwise been disposed of at that landfill.

Second, if project implementation, thus green waste and C&D waste generation, were to occur within a jurisdiction for an extended period of time, disposal of a substantial amount of these waste types could significantly increase the volume of its disposal wastestream, thus, adversely affect the jurisdiction's ability to comply with the AB 939 waste diversion mandate of 50% for that calendar year.

The EIS/EIR should provide a detailed discussion as to how the project could impact the disposal capacity and daily operation of Riverside County landfills in the project area, as well as the above-mentioned four jurisdictions' ability to comply with AB 939, as a result of the project's waste generation capacity and disposal of the its waste. The EIS/EIR should recommend and demonstrate the appropriate mitigation measures for all identified significant impacts of the project.

During project implementation, there will be road closures, detours, pavement re-striping, and/or roadway realignments, etc. These activities will inevitably cause traffic congestion on local roads around the project construction areas. The Department is concerned that the waste hauling traffic to the Lamb Canyon Landfill, El Sobrante Landfill, Moreno Valley Transfer Station (17700 Indian St, Moreno Valley), and Perris Transfer Station (1706 Goetz Road, Perris) could be adversely affected by these ancillary activities of the project. The EIS/EIR should evaluate this project impact potential and recommend the appropriate mitigation for any identified impacts.

The following information can be useful in the analysis of solid waste impacts of the project:

El Sobrante Landfill: The landfill is owned by USA Waste/Waste Management, Inc. (WMI). The existing landfill encompasses over 1000 acres, of which 645 acres are permitted for landfilling. The landfill is currently permitted to receive 10,000 tons of refuse per day (tpd), of which 4,000 tpd is reserved for refuse generated within Riverside County. It has a total capacity of approximately 109 million tons or 184.93 million cubic yards, of which approximately 48 million tons are reserved for in-County waste. As of January 1, 2004, the landfill had a remaining in-County disposal capacity of approximately 40.6 million tons. In the first 9 months of 2004, the El Sobrante Landfill accepted a total of approximately 1.756 million tons of waste, approximately 725,494 tons of which were generated within Riverside County. The daily average for in-County waste was 3,113 tons.¹ The landfill is expected to have a remaining life of approximately 25 - 30 years.

Lamb Canyon Landfill: The landfill is owned and operated by Riverside County. It encompasses approximately 1,088 acres, of which 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 3,000 tons per day of trash for disposal and has a remaining disposal capacity of approximately 13,096,686 tons, as of January 1, 2004.² In the first 9 months of 2004, the landfill received a total tonnage of 176,184, averaging 660 tons a day.¹ The current remaining disposal capacity is estimated to last until approximately 2023. However, landfill expansion potential exists at the Lamb Canyon Landfill site.

¹ On 11/30/04, the Edom Hill Landfill in the Coachella Valley was closed to the public. Solid waste from the Coachella Valley (approximately 1500 to 2650 tons per day) will be transferred from the Edom Hill Transfer Station and the Coachella Valley Transfer Station to the Badlands and Lamb Canyon Landfills in western Riverside County, with 400 tons per day from the Edom Hill Transfer Station transferred to the El Sobrante Landfill. The daily disposal tonnage at these landfills will increase proportionately.

² Remaining Capacity on 1/1/04 was based on capacity projection figures in the Joint Technical Document, Amendment No. 6 and In-County tonnage from SiteInfo (obtained on March 16, 2004)

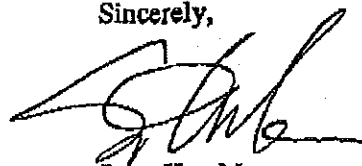
Badlands Landfill: The landfill property is owned and operated by Riverside County and encompasses 1,168.3 acres, of which 150 acres are permitted for landfilling and another 70 acres are permitted for excavation and stockpiling cover material and other ancillary activities. The landfill is currently permitted to receive 4,000 tons per day and has an overall remaining disposal capacity of approximately 10,499,288 tons, as of June 30, 2004.³ In the first 9 months of 2004, the landfill received a total of 394,624 tons of trash for disposal and an average of 1,694 tons per day.¹ The Badlands Landfill is projected to reach capacity between 2015 and 2016. However, landfill expansion potential exists at the Badlands Landfill site.

The project proponent is encouraged to consider incorporating the following measures to help reduce the solid waste impacts of the project:

- Green waste generated by the project from clearing farmlands and natural vegetation on vacant lands should be kept separate from other waste and directed to local wood grinding and/or composting operations.
- Use mulch and/or compost in the establishment and maintenance of landscape areas. Also, consider adopting xeriscaping for all landscaping areas of the project, which favors the use of drought tolerant and low maintenance vegetation over the conventional green vegetation.
- Construction and demolition waste should be reduced and/or diverted from landfill disposal by directing the materials to recycling facilities.

Thank you for the opportunity to review and comment on the Notice of Preparation. We would appreciate a copy of the DEIR for review and comment, when it is available. Please call me at (951)486-3283 if you have any questions regarding the above comments.

Sincerely,



Sung Key Ma
Planner IV

³ Remaining Capacity on 6/30/04 was calculated from latest flight (11/14/03) and In-County tonnage data.